

VANDERSLICE DECL. EXHIBIT A3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation headquartered in California,

Defendant.

Case No. 3:20-cv-08570-JD

**Declaration of Non-Party Netflix, Inc. in
Support of Motion to Seal**

I, Brett Celedonia, declare as follows:

1. I am Vice President and Associate General Counsel, Marketing, Advertising, Comms and Consumer Products at Netflix, Inc. I submit this declaration in support of the parties' omnibus sealing motions filed in connection with class certification and *Daubert* motions filed in this matter.

2. Based on my work at Netflix, I have personal knowledge of the company's practices and procedures for maintaining the confidentiality of its strategic, business, and financial information, as well as the impact of publicly disclosing such information.

3. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on Netflix's policies and practices as they relate to the treatment of confidential information and the materials that were provided to me and reviewed by me, and/or informed by conversations with other knowledgeable employees of Netflix. If called upon as a witness in this action, I could and would testify competently thereto.

4. I have reviewed redacted excerpts of a filing made by Meta Platforms Inc. in this case which references the terms of agreements between Meta and Netflix.

5. Good cause exists to maintain the specific financial terms of the agreements under seal. Netflix considers the specific financial terms of the referenced agreements between Netflix

1 and Meta to be confidential and, to my knowledge, those specific terms are not a matter of public
2 record. These financial terms were negotiated between Meta and Netflix and therefore reveal
3 confidential pricing and other business strategy.

4 6. Public disclosure of the specific financial terms of the referenced agreements could
5 harm Netflix, who is not a party to this action. Disclosure of the specific terms could give Netflix's
6 competitors insight into confidential pricing or cost information and insight into Netflix's
7 confidential business strategy.

8 7. Netflix therefore requests that the Court maintain under seal the following figures
9 and quotations:

- 10 • Dkt. 801-4 (Advertiser Class Rebuttal Report of Catherine Tucker)
- 11 ○ Footnote 132, quotation from agreement
- 12 ○ Footnote 136, specific terms and figures.

13 8. Netflix's request is narrowly tailored to only the specific financial terms of the
14 referenced agreements. This filing is associated with a non-dispositive motion and the specific
15 financial terms of the agreement are not essential to the public's understanding of the class
16 certification motion at issue.

17 I declare that the foregoing is true and correct under penalty of perjury.

18 Signed in Los Angeles, California on August 9, 2024.

19 By: _____

20 Brett Celedonia

DocuSigned by:

Brett Celedonia

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